

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF ALEXANDRIA

**NATIONAL RIFLE ASSOCIATION
OF AMERICA,**

Plaintiff,

v.

ACKERMAN MCQUEEN, INC.

And

MERCURY GROUP, INC.

Defendants.

**Case No. CL19001757,
CL19002067, CL19002886**

**MOTION TO SEAL DEFENDANTS' AMENDED AND SUPPLEMENTAL
COUNTERCLAIM FILED IN CL19001757 AND CL19002067
AND COUNTERCLAIM FILED IN CL19002886**

Plaintiff/Counterclaim Defendant, the National Rifle Association of America (the "NRA"), by counsel, hereby moves this Honorable Court to seal the Amended and Supplemental Counterclaim filed by Ackerman McQueen, Inc. and Mercury Group, Inc. (collectively the "Defendants") and, in support thereof, states as follows:

1. In the Defendants' Amended and Supplemental Counterclaim, deemed filed on October 8, 2019, Defendants included allegations containing information from Mr. Wayne LaPierre's deposition. *See* Defs.' Amend. Countercl. ¶¶ 30, 130.
2. In the Defendants' Counterclaim, filed on October 2, 2019 Defendants included allegations containing information from Mr. Wayne LaPierre's deposition. *See* Defs.' Countercl. ¶¶ 30, 130.

3. The deposition of Mr. LaPierre was designated “Confidential” by counsel for the NRA, and counsel for Defendants did not oppose that designation.
4. Publicly filing Confidential Information is prohibited by the Protective Order entered in this matter.
5. At the motions’ hearing held in this case on October 8, 2019, the NRA orally moved to seal the Amended and Supplemental Counterclaim and to publicly file a redacted version.
See Hearing Trans. pgs. 6-7.
6. AMc does not agree that the information in those two paragraphs is confidential, but does not object to this Motion, and Judge Dawkins held that the deposition testimony in paragraphs 30 and 130 of the Amended and Supplemental Counterclaim may be sealed and a redacted version of the Counterclaim placed in the public file. *See id.*

WHEREFORE, the NRA requests that this Honorable Court enter an Order granting its request to seal Defendants’ original Amended and Supplemental Counterclaim and Counterclaim.

Dated: November 6, 2019

Respectfully submitted,

NATIONAL RIFLE ASSOCIATION
OF AMERICA
By counsel


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CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2019, I caused the foregoing Plaintiff's Motion to Seal to be served via electronic mail and first-class mail upon:

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